

ARSENEAULT & FASSETT, LLP

JACK ARSENEAULT  
DAVID W. FASSETT  
ANGEL M. DeFILIPPO

ATTORNEYS AT LAW  
560 MAIN STREET  
CHATHAM, NEW JERSEY 07928  
(973) 635-3366  
FAX (973) 635-0855  
EMAIL info@af-lawfirm.com

JOHN J. ROBERTS+  
GREGORY D. JONES

+ ALSO ADMITTED IN NEW YORK

July 8, 2020

*Via ECF Only*

Hon. John Michael Vazquez, USDJ  
U.S. Courthouse & Post Office Building  
2 Federal Square  
Newark, NJ 07101

**Re:    *United States v. Joseph Taub*  
Criminal. No. 18-79**

Dear Judge Vazquez:

We respectfully submit this letter concerning yesterday's rescheduling of Mr. Taub's plea hearing from July 15 to July 30 due to his recent travel to Florida.

First, further to yesterday's conference call and Text Order, Mr. Taub has been notified of the new hearing date and will comply with the COVID-19 14-day quarantine in a timely matter. However, we must alert the Court that July 29 and 30 are the Ninth of Av, a Jewish holy day. Accordingly, we respectfully request that the Court reschedule the plea hearing to the next available date.

Second, we again apologize to the Court for the circumstances which necessitated the July 15 date's rescheduling. As the Court knows, that date was selected during a May 29 telephone conference and derived from the Court's then-estimation that Phase II would commence before that date. However, on June 22, when the Court entered the Text Order scheduling yesterday's telephone conference, we were still unaware of any timetable for the commencement of Phase II. At that time, therefore, we assumed that the Court had scheduled the conference to reschedule the July 15 date. That same day, when Mr. Taub told us that his sister-in-law had invited his family to Florida on July 1, we blessed the trip but told him he might need to return very quickly if the July 15 date held. Two days later, on June 24, New Jersey mandated the 14-day quarantine period for travelers coming from Florida. At that time, we should have advised Mr. Taub not to travel to Florida on July 1, but we neglected to do so. Again, we take full responsibility, and apologize, for the sequence of events which made Mr. Taub unavailable to appear in-person for the July 15 plea hearing.

Finally, and unrelatedly, on June 30 the Clerk's Office posted an ECF notification terminating the parallel *in rem* forfeiture case, Civil Number 16-9158, presumably because the proposed extension submitted by the Government (and consented to by Mr. Taub) on June 17 (ECF 207) was never entered.

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Since that notification, other claimants to the assets restrained in that case have asked Mr. Taub whether those assets are now unrestrained and, if so, what they should do with them. Mr. Taub has continued to adhere to the restraining orders and has not counseled any other claimant to transfer or alienate any restrained assets. We stand by our consent to the Government's extension request and to the forfeiture case's reinstatement.

We thank the Court for considering this submission.

Respectfully,

/s/ Jack Arseneault

/s/ Greg Jones

cc: Joseph Taub  
Daniel V. Shapiro, AUSA  
Catherine R. Murphy, AUSA  
Jennifer S. Kozar, AUSA

The Plea hearing is rescheduled to July 28, 2020 at 10:30 a.m.

SO ORDERED.

s/ John Michael Vazquez  
John Michael Vazquez, U.S.D.J.

Date: 7/13/2020